

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT
DISTRICT OF MASS.

KEVIN TAYLOR,

Plaintiff,

v.

HARLEY G. LAPPEN, Director,
Federal Bureau of Prisons;
C. BECOTTE, Chief Psychologist,
FMC Devens; S. BISCO, Social
Worker, Psychology and Mental
Health Department, FMC Devens;
C. J. DEROSA, Warden, FCI Fort
Dix; HERNANDEZ, Unit Manager,
FMC Devens; HUFNAGEL, Case
Manager, J-Unit, FMC Devens;
C. MAYO, Psychologist Technician,
FMC Devens; C. RENAUD,
Psychologist, FMC Devens;
D. DODRILL, Regional Director,
Northeast Regional Office,
Federal Bureau of Prisons; J.
STRICKLAND, Case Manager, Unit
5752, FCI Fort Dix; UNKNOWN
Unit Manager, FCI Fort Dix, Unit
Manager of Units 5752 and 5751;
DAVID L. WINN, Warden, FMC Devens,

CIVIL DOCKET NO.
04-40163-PBS

Defendants,

MOTION FOR ENLARGEMENT OF TIME

The Plaintiff, Kevin Taylor, by and through Pro se, respectfully requests an enlargement of time for which to file an opposition to the defendants' motion to dismiss/ or summary judgment. In support of this motion, the Plaintiff submits the following:

1. On or about August 13, 2004, the Plaintiff filed a civil action complaint with this United States District Court.

2. The Plaintiff amended his complaint which he was granted leave to do so by the Court and further ordered the defendants served with such amendment. The Court also directed the defendants to file a response to the complaint within Sixty days of service.

3. On July, 2005, all but one defendant were served the amended complaint. Though, the United States Attorney was also served the Plaintiff again served the United States Attorney Office with a copy of the complaint after he did not receive a response from that office within Sixty days. The United States Attorney did file a response to the complaint on May 17, 2006.

4. The Plaintiff submits that he need additional time of sixty days to file his motion in opposition to the defendants' motion to dismiss because he is pro se, he is also inexperience in law, and further he is at a disadvantage to the United States Attorney who is a trained professional lawyer.

5. Further, besides being pro se, the Plaintiff also has insufficient time to use the law library because of his mandatory work schedule, limited use of the type-writers which he can only use once a day at one given period in the morning, noon or evening. Moreover, the Plaintiff must used inadequate law books that are three to four weeks behind which all research is manual since we have no computers. In addition, all books and typewriters are share amongst forty to fifty inmates who are constantly working on their cases.

6. Lastly, because civil law is so complicated that the need for time to comprehend the procedures, the laws, and case


law to file a proper motion is a necessity.

7. In addition, an extension of time should be granted when the Plaintiff has just received another motion to dismiss from the defendant in another case, which needs immediately response since such affects his possible release date of June 26, 2006.

WHEREFORE, for the foregoing reasons, the Plaintiff respectfully requests this Honorable Court grant an enlargement of time (60 days) to file motion in opposition to the defendants' motion to dismiss/ or summary judgment.

Respectfully submitted,

Dated: May 26, 2006.


Kevin Taylor
Reg. No. 03421-068
Devens-FMC
P. O. Box 879
Ayer, MA 01432

CERTIFICATE OF SERVICE

I, Kevin Taylor, declare under the penalty of perjury that I have served a copy of the attached motion for enlargement of time upon the Assistant U.S. Attorney Christopher R. Donato, whose address is United States Attorney's Office, John Joseph Moakley Courthouse, Suite 9200, 1 Courthouse Way, Boston, MA 02210 via first class U.S. Mail on this 26 day of May, 2006.

Kevin Taylor
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